

LAW OFFICES OF JILL R. SHELLOW

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April 19, 2023

BY EMAIL AND ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
LimanNYSDChambers@nysd.uscourts.gov

RE: *United States v. Isabella Pollok*, 20-cr-110 (LJL)

Dear Judge Liman:

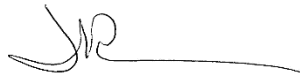
I write to request respectfully that Your Honor adjourn the restitution hearing scheduled for April 20, 2023, for approximately 45 days. This will allow the parties to complete negotiations on a payment plan that permits Ms. Pollok to meet her living expenses while making restitution payments, thus minimizing the risk of a violation of her supervised release.

On April 9, 2023, the Government sent us a proposed restitution order and payment plan. We have agreed to the total restitution but are still negotiating a payment plan. We do not expect, given the required approvals within the United States Attorney's Office, Mr. Bertan's schedule and my own, that we will complete this process before tomorrow.

The 45 days are necessary because I am preparing for a trial that begins on May 1, 2023 that likely will last about three weeks. For personal reasons, Mr. Bertan is unavailable from April 24-May 10. Ms. Pollok surrenders on April 25, 2023. In the unlikely event that a hearing is necessary, Ms. Pollok requests that her presence be excused or that she participate by telephone so that her surrender date is not delayed. We proposed this schedule to the Government yesterday, but as of this writing have not received a response.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow
David K. Bertan

cc: All parties (by ECF and email)